

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i>	BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
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In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

**THOSE PARTIES LISTED ON
APPENDIX A TO COMPLAINT
and JOHN AND JANE
DOES 1-1000,**

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

Adv. Pro. No. 23-01092 (MBK)

APPLICATION FOR ORDER SHORTENING TIME

The applicant, Donald W. Clarke, Esq., on behalf of the Official Talc Claimants Committee (the “Committee”), requests that the time period for the REQUEST OF OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR ORDER CERTIFYING DIRECT APPEAL OF PRELIMINARY INJUNCTION ORDER OF APRIL 20, 2023 TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT [Doc 84] be shortened, pursuant to Fed. R. Bankr. P 9006(c)(1), so that it can be determined at hearing no later than April 27, 2023, for the reason(s) set forth below:

1. A shortened time hearing is requested because:

the Court previously granted direct certification concerning the Debtor’s preliminary injunction against talc claimants in the Debtor’s first bankruptcy. There is even

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

more reason to certify the direct appeal of this Court's PI Order. The Third Circuit has a strong interest in enforcing its mandate and in preventing the Debtor from flouting its prior decision. Time is critical, because more claimants will die in the interim if an appeal languishes in the district court rather than proceeding directly to the Third Circuit. The Debtor threatens to outrun the appellate process by rushing a plan through before the Third Circuit can provide appellate review. The Debtor's sprint is evident by its recent request for a hearing on a disclosure statement that has yet to be filed.

Because of the time pressure created by the Debtor—including its stated intent to propose a plan by May 14, 2023—the Committee plans to seek emergency relief in the Third Circuit unless this Court certifies the PI Order for immediate appeal on or before April 27, 2023.

2. State the hearing dates requested: The Committee respectfully requests this matter be listed for on or before April 27, 2023.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

4/22/2023
Date: _____



Signature

Donald W. Clarke
Genova Burns, LLC